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6

7 Attorney for Marcus Ricardson

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MARCUS RICHARDSON,

15 Defendant,
16

Case No. 2:16-cr-291-GMN-PAL-1

UNOPPOSED MOTION TO MODIFY
CONDITIONS OF RELEASE

17
18 The Defendant, Marcus Richardson, through his attorney, Rene L. Valladares, Federal Public
19 Defender, and Rebecca Levy, Assistant Federal Public Defender, respectfully moves this Honorable
20 Court to modify condition of his release.

21 DATED this 25th day of June, 2018.

22 RENE L. VALLADARES
Federal Public Defender
23

24 By /s/ Rebecca Levy
REBECCA LEVY
25 Assistant Federal Public Defender
26 Attorney for Marcus Richardson
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1 **ARGUMENT**

2 On September 30, 2016, Mr. Richardson made his initial appearance on a complaint alleging, a
3 violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), Conspiracy to Distribute Heroin. Docket #1.
4 Mr. Richardson was released with certain conditions. One of those conditions, #20, restricts
5 Mr. Richardson from travel outside of Nevada Mr. Richardson is requesting this condition be modified
6 to allow him to travel with his wife to Santa Monica, California from July 6, 2018 through July 8, 2018.
7 The government and Pre-Trial Services have no objection to this request. The government does not
8 object to this request.

9 Mr. Richardson has been complying with all conditions of his release for almost two-years and
10 has had no problems. The government does not object to this request.

11 **CONCLUSION**

12 Accordingly, we are respectfully requesting this Court modify the conditions of
13 Mr. Richardson's release to allow him to travel to Santa Monica, California from July 6, 2018 through
14 July 8, 2018.

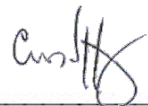
15 Respectfully Submitted,

16 RENE L. VALLADARES
17 Federal Public Defender

18 By /s/ Rebecca Levy
19 REBECCA LEVY
20 Assistant Federal Public Defender
21 Attorney for Marcus Richardson

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23 IT IS SO ORDERED.

24 DATED: June 26, 2018

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26 
27 _____
28 C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on, June 25, 2018, he served a copy of the above and foregoing **UNOPPOSED MOTION** **TO MODIFY CONDITIONS OF RELEASE** by electronic mail to all parties of record including the persons named below:

DAYLE ELIESON
United States Attorney
ROBERT KNIEF
Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ Brandon Thomas, Legal Assistant
Employee of the Federal Public Defender